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12 *Attorneys for Defendants Thor Motor Coach, Inc.;*
CWI, Inc.; Wheeler RV Las Vegas, LLC
13 *d/b/a Camping World RV Sales*
14

15 **UNITED STATES DISTRICT COURT**
16 **DISTRICT OF NEVADA**

17 ALAN PRENTISS, an individual,
18 Plaintiff,

19 v.

20 THOR MOTOR COACH, INC., a Foreign
Corporation; CAMPING WORLD, INC., a
21 Foreign Corporation; WHEELER RV LAS
VEGAS, LLC d/b/a CAMPING WORLD RV
22 SALES, a Foreign Corporation; DOES I-V, and
ROE CORPORATIONS VI-X; inclusive,
23 Defendants.
24

CASE NO.: 2:18-cv-01628-MMD-NJK

**STIPULATION FOR PROTECTIVE
ORDER REGARDING
CONFIDENTIAL DOCUMENTS**

25 The parties hereby stipulate and agree as follows:

26 WHEREAS, the parties, by and through their attorneys, have requested the inspection,
27 copying, and/or production of certain documents and materials containing proprietary and
28 competitively-sensitive business information constituting confidential commercial

1 information covered by Fed. R. Civ. P. 26(c)(1)(G); and

2 WHEREAS, Thor Motor Coach, Inc. (TMC) requires that the confidentiality of the
3 documents and/or materials, and the information contained in the documents and materials,
4 be maintained; and

5 WHEREAS, the parties and their attorneys have agreed to comply with the letter and
6 intent of that confidentiality:

7 IT IS HEREBY STIPULATED THAT:

8 The parties and their attorneys shall not give, show, or otherwise directly or indirectly
9 disclose any such documents and/or materials identified as “Confidential,” or the substance
10 thereof, or any copies, prints, negatives, or summaries thereof, to any entity or person except
11 the parties and their attorneys and any agents, experts, consultants, other persons employed
12 by the parties, witnesses, potential witnesses, court reporters or court personnel in connection
13 with and solely for this action. Any person retaining the documents and/or materials
14 identified as “Confidential” shall review the Protective Order entered pursuant to this
15 Stipulation, agree to abide by the Protective Order, and acknowledge in writing his or her
16 agreement to abide by the Protective Order.
17

18
19 Within 14 days after the conclusion of this litigation by settlement, judgment, appeal,
20 or otherwise, the parties and their attorneys shall, upon written request by TMC, either (1)
21 return to TMC, all documents and copies of all documents identified as “Confidential”; or
22 (2) destroy all documents and copies of all documents identified as “Confidential” and certify
23 in writing that destruction.
24

25 To be deemed “Confidential,” the documents and/or materials must be so marked by
26 TMC, or specified in the record.
27

28 / / /

The Court may amend this order as is appropriate.

~~This Order shall not be amended except on prior written notice to counsel.~~

IT IS SO STIPULATED.

DATED this 26th day of March 2019.

/s/ Shalev Amar, Esq.
Shalev Amar, Esq. (Pro Hac Vice)
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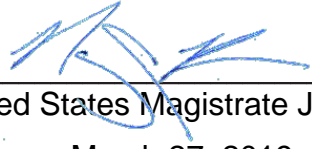
DATED this 26th day of March 2019.

/s/ John D. Sear, Esq.
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Attorneys for Defendants

IT IS SO ORDERED.


United States Magistrate Judge

DATED: March 27, 2019